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July 22, 2013

The Honorable Sandra L. Townes
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Javier Calle-Serna
Criminal Docket No. 06 CR 091 (S 3) (SLT)

Dear Judge Townes:

The above referenced matter is scheduled for a status conference on July 26th, 2013 at 11:30 A.M.. Counsel is respectfully requesting that this matter be reset for another thirty (30) days to allow the parties to continue their plea negotiations in this cause. Since the last adjournment granted by this Honorable Court the parties have scheduled interviews with the Defendant but additional interviews are necessary. Accordingly, counsel has conferred with the Assistant United States Attorney, Justin Lerer, Esq., who does not object to the requested continuance of the status conference.

Accordingly, the parties jointly request that the Court adjourn the status conference to the date proposed above. The parties respectfully request that the Court exclude the time from July 26th, 2013 through the new date as scheduled by the Court. The parties submit that such an exclusion would serve the ends of justice in this matter and outweighs the best interest of the public and the defendant in a speedy trial pursuant to Title 18, United States Code, Section 3161(h)(7)(A), because it will allow the parties to finalize their disposition of this case. The Government joins in this request.

Respectfully submitted,

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Ruben Oliva, Esq.

cc: Justin Lerer, AUSA
Tyler Smith, AUSA